

Before the
COPYRIGHT ROYALTY JUDGES
The Library of Congress

In re

Distribution of Cable Royalty Funds

**CONSOLIDATED
DOCKET NO. 16-CRB-0009 CD
(2014–17)**

COMMENTS OF THE PUBLIC TELEVISION CLAIMANTS

Pursuant to the Copyright Royalty Judges’ request for comments, 83 Fed. Reg. 56106 (Nov. 9, 2018) (“Request”), Public Broadcasting Service (“PBS”) hereby provides comments on behalf of copyright owners of programs broadcast on U.S. noncommercial educational television stations that are retransmitted by cable systems (the “Public Television Claimants”). The Judges’ Request seeks comments on the existence and extent of any controversies regarding distribution of the 2014 through 2017 cable royalty funds.

At this time, an Allocation Phase controversy exists as to the shares of the 2014–17 cable royalty funds that should be allocated to each of the Allocation Phase categories, including the Public Television Claimants category.¹

PBS is not aware of any Distribution Phase controversies within the Public Television Claimants category with respect to the 2014–17 cable royalty funds that PBS currently believes would require resolution by the Judges. If any other party asserts a Distribution Phase claim to any of the 2014–17 cable royalty funds in the Public Television Claimants category, there would

¹ See generally *Initial Determination of Royalty Allocation*, Docket No. 14-CRB-0010-CD (2010–13), at 1 n.1 & 94 n.162 (Oct. 18, 2018) (describing Allocation Phase categories).

be a Distribution Phase controversy with respect to any such claims to the extent such claims remain unresolved.²

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Respectfully submitted,

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² PBS reserves the right to identify additional controversies in response to filings of other claimants, rulings of the Judges, or further information.